

# **EXHIBIT H**

**From:** Reagan George  
**Sent:** Thursday, January 17, 2019 9:59 PM  
**To:** Patrick McSweeney (patrick@mck-lawyers.com)  
**Subject:** FW: R. George and VVA Subpoenas-- LULAC et al. v. PILF et al., 18-cv-423 (EDVA)

Here is the email from Christian.

Reagan G. George  
713.545.1047 cell  
703.803.8482 office  
rgeorge137@cox.net

**Our hope is science. “When the search for truth is confused with political advocacy, the pursuit of knowledge is reduced to a quest for power” - Alston Chase, as quoted by Michael Crichton in his book, State of Fear**

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**From:** Christian Adams [mailto:adams@electionlawcenter.com]  
**Sent:** Thursday, January 17, 2019 11:59 AM  
**To:** 'Reagan George'  
**Subject:** RE: R. George and VVA Subpoenas-- LULAC et al. v. PILF et al., 18-cv-423 (EDVA)

Regan – please tell Pat that if he needs help to find someone for you to let me know. I have a couple of possibilities but they might be harder lifts than what you are looking at already.

Also, it is astonishing to me that lawyer Cleminshaw would be blustering and posturing the way she is after the disastrous hearing they had last week where they severely tested the patience of the judge on discovery issues and the judge was quite obviously annoyed at them for wasting the court’s time on a discovery fight that should have been worked out outside of court.

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**Sent:** Thursday, January 17, 2019 11:24 AM  
**To:** 'Reagan George' <rgeorge137@cox.net>  
**Subject:** FW: R. George and VVA Subpoenas-- LULAC et al. v. PILF et al., 18-cv-423 (EDVA)

Christian;

Here is the latest response to Cleminshaw.

Reagan G. George  
713.545.1047 cell  
703.803.8482 office  
rgeorge137@cox.net

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**From:** Patrick McSweeney [mailto:patrick@mck-lawyers.com]

**Sent:** Thursday, January 17, 2019 10:59 AM

**To:** Cleminshaw, Nicole M

**Cc:** Reagan George

**Subject:** Re: R. George and VVA Subpoenas-- LULAC et al. v. PILF et al., 18-cv-423 (EDVA)

Ms. Cleminshaw,

I advised you previously that I was unable to review the voluminous materials involved in responding to your subpoenas for a period of time because of my litigation schedule. You declined to agree to an extension. I completed a final draft of a petition for a writ of certiorari this morning and will have time to respond to you later today, but will have severe scheduling constraints thereafter. I will prepare a response to accommodate you while I attempt to arrange other representation for the individual and entity that were served. Upon preliminary review of the requests, I must say that I am astonished by their reach. You will receive objections later today by email.

Pat

On Wed, Jan 16, 2019 at 8:58 PM Cleminshaw, Nicole M <[Nicole.Cleminshaw@skadden.com](mailto:Nicole.Cleminshaw@skadden.com)> wrote:

Mr. McSweeney,

I write again with regard to the subpoenas served on Mr. Reagan George and his organization, Virginia Voters Alliance. These entities have failed to object to, obey or respond in any substantive form to Plaintiffs' subpoenas. And you have not responded at all to my email of 8 days ago. So while we would prefer to resolve compliance without the need for expensive court intervention, we cannot abide this continued noncompliance with the subpoenas. We will also follow up via telephone tomorrow.

Thanks,

Nicole

**Nicole M. Cleminshaw**

**Admitted to Practice in Virginia Only; Supervised by a Member of the D.C. Bar**

**Skadden, Arps, Slate, Meagher & Flom LLP**

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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